

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

TERRY KNOX AND CAROLYN
"COKE" KNOX,

Plaintiffs,

V.

MONSANTO COMPANY, et al.,

Defendants.

No. _____

DECLARATION OF KERRY YATES
IN SUPPORT OF MONSANTO'S NOTICE OF REMOVAL

I, Kerry S. Yates, declare as follows:

1. I am currently employed by Bayer/Monsanto as a Chemistry Account Manager for Montana, Wyoming, and Utah. I have held this position since 1979. I became responsible for providing support to the region that includes Denton, Montana in 2002. Prior to 2002, my territorial responsibilities did not include any activities in the region of Montana in which Denton is located.

2. As Chemistry Account Manager, I provide support to distributors and retailers of Bayer/Monsanto products regarding product performance issues. On limited occasions I have communicated with end-users regarding issues with product performance. I don't recall ever having any communications with plaintiffs regarding product performance issues, or anything else.

3. I am not, and have never been, a retailer or wholesaler of Roundup or any glyphosate based products. I have never solicited sales or taken orders for any Monsanto product from any person or company. Retailers and distributors place their orders directly with Bayer/Monsanto corporate offices. The products are transmitted to the local distributors or retailers directly from Monsanto. I have never physically delivered any Monsanto products, including Roundup products or other glyphosate-based products, to any distributor, retailer, or user.

4. I have never accepted payment for orders for any Monsanto products, including Roundup products or other glyphosate-based products. I have never had any involvement in the exchange of money for Roundup or other glyphosate based products. Monsanto is paid directly, usually from distributors or retailers rather than farmers or end users of Monsanto's products.

5. I have never manufactured or packaged any Monsanto products, including Roundup products or other glyphosate-based products.

6. I have never been responsible for tracking or being knowledgeable about the amount of Roundup used by individual growers or end users. I do not know, nor have I ever known, how much, if any, Roundup plaintiffs have purchased or used.

7. I do not recall ever meeting or talking directly with the plaintiffs, Terry Knox and Carolyn "Coke" Knox, at any point during the course of my employment with Monsanto/Bayer or in my personal life. I do not recall ever having a discussion with plaintiffs about their use of Roundup. I do not recall ever visiting plaintiffs' farm or any location where they alleges they sprayed Roundup. I am not aware of ever making any statements at all to plaintiffs regarding Roundup or glyphosate-based products.

8. I have and had no malice or ill intention directed at the plaintiffs, Terry Knox and Carolyn "Coke" Knox, at any time. I do not know them.

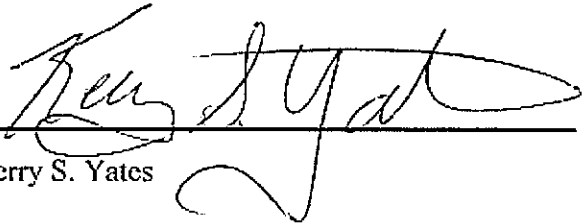
9. I have never received any personal pecuniary benefit for any activities related to Roundup or glyphosate-based products beyond that directly stemming from fulfilling my job duties as Bayer/Monsanto employee.

10. At all times past and present my actions to promote and support the use of Roundup by Bayer/Monsanto customers have been taken within the scope of my employment and specifically for the benefit and in the interests of my employer.

11. I have no knowledge of Roundup being carcinogenic or being a threat to the general public's health.

I hereby declare under the penalty of perjury that the facts set forth herein are true and correct.

Executed this 10th day of May, 2019


Kerry S. Yates